

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

SHELBY ZELONIS ROBERSON,	)	
<i>individually and on behalf of all others</i>	)	
<i>similarly situated,</i>	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 1:20-cv-00111-RDA-MSN
v.	)	
	)	
CLEARVIEW AI, INC.,	)	
	)	
Defendant.	)	

**DEFENDANT CLEARVIEW AI, INC.’S MOTION TO  
TRANSFER VENUE UNDER 28 U.S.C. § 1404 AND  
STAY CASE PENDING DECISION ON TRANSFER**

Defendant Clearview AI, Inc., by its undersigned attorneys, hereby moves this Court to transfer this case to the U.S. District Court for the Southern District of New York pursuant to 28 U.S.C. § 1404 and to stay the case pending the Court’s decision on transfer. The grounds for this motion are set forth in Defendant’s Memorandum of Law and Declaration of Thomas Mulcaire, which accompany this motion.

Counsel certifies, pursuant to Local Civ. R. 7(E), that they have conferred with counsel for Plaintiff regarding the instant motion in a good faith effort to narrow the area of disagreement. Plaintiff has indicated that they oppose the motion.

Dated: March 25, 2020

Respectfully submitted,

/s/ Jan A. Larson

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*Attorneys for Defendant Clearview AI, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on March 25, 2020, I electronically filed this document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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Dated this March 25, 2020.

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